



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 05 2016

CERTIFIED MAIL #7009 1680 0000 7648 7443
RETURN RECEIPT REQUESTED

Ms. Amy Fuller
Production Operations Manager
Original Smith Printing
Two Hardman Drive
Bloomington, Illinois 61701

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – Original Smith Printing
EPA ID No.: ILD 984 834 424

Dear Ms. Fuller:

On November 19, 2015 a representative of the U.S. Environmental Protection Agency inspected Original Smith Printing (OSP) facility, located in Bloomington, Illinois. As a large quantity generator of hazardous waste, OSP is subject to the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate OSP's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by OSP, EPA's review of records pertaining to OSP, and the inspector's observations, EPA has determined that OSP has unlawfully stored hazardous waste without a permit or interim status as a result of OSP's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 CFR 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which OSP was out of compliance at the time of the inspection in paragraphs 1 through 7, below.

Many of the conditions for the RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its

permit exemption due to failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725; the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirements. The exemption conditions identified in paragraphs 1- 7 are also independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of OSP to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 724 [40 CFR Part 264] (if the facility should have been permitted).

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, OSP was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1 through 7 are independent TSD requirements violated by OSP.

Training

1. A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, OSP's records for Robert Moore and William Johnson did not include a written description of the type and amount of introductory and continuing training given to them.

At the time of the inspection, OSP did not have and was unable to provide a written description of hazardous waste duties for Robert Moore and William Johnson.

At the time of the inspection, OSP was unable to provide a job description for Amy Fuller.

At the time of the inspection, OSP was unable to provide records that document that the training or job experience described above has been given to and completed by facility personnel William Johnson in the year 2015.

Contingency Plan

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital and state and local emergency response teams that may be called upon to provide emergency services. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.153(b) [40 C.F.R. §§ 262.34(a)(4) and 265.53(b)].

At the time of the inspection, OSP had not submitted a copy of the facility contingency plan to the local hospital, police and fire departments that may be called upon to provide emergency services.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator's written contingency plan must include, among other things, the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152 (d) [40 CFR §§ 262.34(a)(4) and 265.52(d)].

At the time of the inspection, OSP's contingency plan did not list the home addresses of the primary and alternate emergency coordinators.

Use and Management of Containers

4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must always keep containers closed during storage, except when it is necessary to add or remove waste. See Ill. Admin. Code tit. 35 §§722.134(c)(1)(A) and 725.273(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)].

At the time of the inspection, one container containing waste solvent near the 12-color printing press was open.

Date When Each Period of Accumulation Begins

5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must clearly mark each container holding hazardous waste with the date accumulation begins. See, IAC Ill. Admin. Code tit. 35 §§722.134(a)(2) [40 CFR § 262.34(a)(2)].

At the time of the inspection, OSP was accumulating hazardous waste in one 240-gallon tote that was not marked with the date accumulation began.

Marking/Identification Requirements

6. A large quantity generator of hazardous waste must label or mark clearly each container holding hazardous waste with the words "Hazardous Waste." See Ill. Admin. Code tit. 35 §722.134 (a)(3) [40 CFR § 262.34(a)(3)].

At the time of the inspection, OSP was storing hazardous waste in one 240-gallon tote that was not marked or labeled with the words, "Hazardous Waste."

7. A large quantity generator of hazardous waste may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation provided the containers are marked with either the words "Hazardous Waste" or other words that identify the contents. See Ill. Admin. Code tit. 35 §722.134 (c) [40 CFR § 262.34(c)].

At the time of the inspection, the following containers near the point of generation used to hold hazardous waste were not labeled with the words "hazardous waste" or other words that identify the contents:

- two unlabeled 2-gallon containers of waste solvent located at the 6-color printing press;
- two unlabeled 5-gallon containers of waste solvent located at 10-color printing press;

- one unlabeled container of waste solvent located at 8-color printing press;
- one unlabeled container of waste solvent located near the 12-color printing press; and
- one unlabeled 240-gallon container of waste solvent

Summary: By failing to comply with the conditions for a permit exemption, above, OSP became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. OSP failed to apply for such a permit. OSP's failure to apply for and obtain a hazardous waste storage permit violated Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

After the inspection, as documented in November 23-25, 2015, December 15 and January 25, 2015, emails to EPA, you took certain actions to establish compliance with violations 1 through 7, above. Based on the information received from OSP, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates OSP's cooperation.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,



Margaret M. Guerriero
Director
Land and Chemicals Division

Enclosure

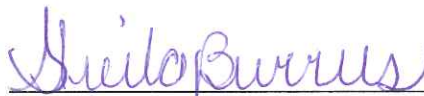
cc: Todd Marvel, Illinois EPA (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Original Smith Printing
U.S. EPA ID. No.: ILD 984 834 424
LOCATION ADDRESS: Two Hardman Drive
Bloomington, Illinois 61701
DATE OF INSPECTION: November 19, 2015
U.S. EPA INSPECTORS: Sheila Burrus, RCRA Hazardous Waste

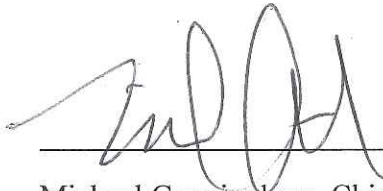
PREPARED BY:



Sheila Burrus
Environmental Protection Specialist

12/15/15
Date:

APPROVED BY:



Michael Cunningham, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

12-15-15

Date:

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced compliance evaluation inspection (CEI) at Original Smith Printing (OSP), located at Two Hardman Drive, Bloomington, Indiana, to evaluate Original Smith Printing's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the management of hazardous waste and used oil.

Participants: Amy Fuller, Production Manager represented Original Smith Printing. Sheila Burrus represented EPA Region 5.

Installation Description/Background

Original Smith Printing is a full-service commercial printing company. The facility provides high-quality brochures, annual reports, postcards, pocket folders, posters, fulfillment, and bindery services. Some of its customers are State Farm Insurance and Abbott Laboratory.

The facility has one 6-color single-sided printing press, one 12-color double-sided printing press, one 10-color double-sided printing press, one 8-color double-sided printing press, as well as one 8-color web press and one 6-color web press.

OSP has one less than 90-day hazardous waste storage area located in the chemical explosion room and several hazardous waste satellite accumulation areas located near the printing presses.

OSP was last inspected by the Illinois Environmental Protection Agency on January 8, 2012. A review of hazardous waste manifests and waste volume on-site indicates that OSP has been operating as a large quantity generator.

Waste Generation

OSP generates waste solvent from its printing press operation. OSP uses a solvent blanket wash to clean the rubber on the rotating cylinders that transfers ink to the paper on the printing presses. The waste solvent is collected into 5-gallon satellite accumulation containers via hose and transferred into a 240-gallon tote located in the chemical explosion room.

There is never more than 39-gallons of waste solvent in the 240-gallon satellite accumulation container (tote) at one time. The large container (tote) is used to eliminate spillage during the transfer of the satellite waste from its printing presses into the container (tote).

The waste solvent in the 240-gallon container is then transferred via piping into a distill unit to burn off water. The de-watered waste solvent is then transferred back into another 240-gallon container (tote) for disposal. The less than 90-day container (tote) is labeled and dated upon the initial transfer of waste from the distill unit. The waste is shipped off-site when the container reaches the capacity of 180-200 gallons. It takes approximately 4-6 weeks to fill the tote to the above capacity. The last waste solvent pickup was on October 31, 2015. Ms. Fuller stated that the facility is leaning toward becoming a small quantity generator due to the distill unit.

The distill unit also generates non-hazardous waste sludge which is transferred via piping into a 55-gallon drum for disposal.

OSP generates used oil from its maintenance operations and universal waste lamps.

Opening Conference

I arrived at OSP at 8:30 a.m. on November 19, 2015. I introduced myself and presented my enforcement credentials to personnel at the receptionist desk and explained my visit. When Amy Fuller arrived at the receptionist desk to assist me, I presented my enforcement officer credentials to her and explained that I was there to conduct a compliance evaluation inspection.

We then proceeded into a conference room where I explained to Ms. Fuller that I would be conducting a compliance evaluation inspection that included a visual site inspection and records review. I then proceeded to conduct the opening conference by explaining what specific records I would need to review.

I informed Ms. Fuller that OSP could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal communication, documents, and photographs. OSP did not make a CBI claim on the information gathered during the inspection.

I asked Ms. Fuller for a brief description of the type of work done at this installation and types of wastes generated. Ms. Fuller provided background and waste stream information about OSP which is included above in the installation description/background section of this report.

I provided a Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention State Contact list, Illinois Waste Management Research Sustainable Solutions Brochure and the U.S. EPA Managing Used Oil Advice for Small Business brochure.

I continued the opening conference by asking who picks up OSP's hazardous waste. Ms. Fuller indicated that Safety Kleen picks up its hazardous waste, universal waste lamps and used oil. Safety Kleen also services OSP's non-hazardous parts washer by performing a full flush 3-4 times per year.

I began the CEI by conducting the records review portion of the inspection.

Records Review

For the records review, I informed Ms. Fuller that I wanted to review the contingency plan, waste analysis plan, hazardous waste manifests, land disposal restriction records, weekly inspection logs for the hazardous waste storage area, annual reports, training records and job descriptions.

My observations are categorized below:

Contingency Plan

OSP was unable to provide documentation showing that a copy of the contingency plan (chemical spill response plan) had been sent to the local hospital, fire and police departments. I received documentation via email showing that a copy of the contingency plan was received by fire and police departments on November 23, 2015.

OPS's contingency plan did not include the alternate emergency coordinator's home addresses. I received documentation via email showing that the contingency plan was revised to include the primary and alternate emergency coordinator's home addresses on November 23, 2015.

Weekly Inspection Logs

I reviewed weekly inspection logs for the years 2015. Ms. Fuller stated that OSP began documenting weekly inspections in the year 2015. She also stated that weekly inspections has been conducted for previous years but not documented.

Training Records/Job Description

OSP was unable to provide documentation showing that facility personnel took part in an initial or annual review of hazardous waste training.

OSP hired William Johnson on March 13, 2015 to manage and/or handle hazardous waste but was unable to provide documentation showing that Mr. Johnson received his initial hazardous waste training.

OSP hired Amy Fuller on September 30, 2015 and Robert Moore on September 13, 2015. I informed Ms. Fuller that the initial hazardous waste training will need to be taken and completed by her and Mr. Johnson 6 months from their start date of employment.

According to Ms. Fuller, OSP's headquarters office recently put together a training program for its employees that handle and management hazardous waste. The above employees took the training on November 23, 2015.

I received documentation showing that Ms. Fuller, Messrs. Johnson and Moore took hazardous waste training on November 23, 2015.

OSP was unable to provide for review a job description for Amy Fuller.

OSP job descriptions for Messrs. Moore and Johnson do not describe the type and amount of training (initial/continuous) related to hazardous waste management.

OSP's job description document does not describe the hazardous waste duties for Messrs. Moore and Johnson.

I reviewed hazardous waste manifests, land disposal restriction forms, waste analysis data, and biennial reports. I found the remaining above records provided for review to be complete.

Visual Site Inspection

I was accompanied by Ms. Fuller during the VSI portion of the inspection. The areas of the OSP facility inspected included, but was not limited to: shipping/fulfillment area, bindery/finishing department, cutting department, print/web presses, chemical explosion room and maintenance area.

The following is a summary of information obtained while touring the above areas.

After completion of the records review, Ms. Fuller and I began the VSI in the shipping/fulfillment area, bindery/finishing department and cutting department.

We then proceeded to the printing press area where I observed the following:

- There were two unlabeled 2-gallon satellite accumulation containers of waste solvent located at the 6-color printing press (Photograph 1).
- There were two unlabeled 5-gallon containers of waste solvent located at the 10-color printing press (Photograph 2).

- There was one unlabeled container of waste solvent located at the 8-color printing press (Photograph 3).
- There was one open and unlabeled container of waste solvent located near the 12-color printing press (Photograph 4). The open and unlabeled container of waste solvent was drained from the printing press during equipment repairs.
- There was one 55-gallon container of non-hazardous waste sludge located at the solvent recycling system via a connected red hose (Photograph 5).

Next we proceeded to a solvent recycling system which is located outside of the chemical explosion room. There was an empty 5-gallon container next to the recycler to catch any waste solvent overflow. I informed Ms. Fuller that, although the container was empty, hazardous waste satellite accumulation containers must be labeled if they are in place and ready to receive hazardous waste.

- We then proceeded to the chemical explosion room where I observed one 330-gallon container (tote) of raw product (blanket/roller wash), nine 55-gallon containers of raw material (blanket wash), an unlabeled 240-gallon container (tote) of waste solvent, an unlabeled 240-gallon satellite accumulation container (tote) of waste solvent and a labeled 55-gallon drum of used oil located in the explosion room (Photographs 6 through 8).
- Additional photographs taken throughout the facility (Photographs 9 through 12).

After leaving the chemical explosion room, we proceeded to the maintenance area where universal lamps are usually stored. There were no waste lamps on-site at the time of the inspection.

I observed fire extinguishers and eyewash stations throughout the facility.

Closing Conference

In closing, a conference was held with Ms. Fuller. I summarized where I had been taken during the VSI and what information Ms. Fuller presented to me. I thanked her for her cooperation and concluded the CEI at approximately 12:20 p.m.

Attachments

Inspection Checklist
Photographs 1 and 12



PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

6-color printing press

SCENE BEING PHOTOGRAPHED:

two, unlabeled 5-gallon satellite accumulation
containers of waste solvent

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 2

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

10-color printing press

SCENE BEING PHOTOGRAPHED:

two, unlabeled 5-gallon containers of waste solvent

SITE LOCATION:

Two Hardman Drive

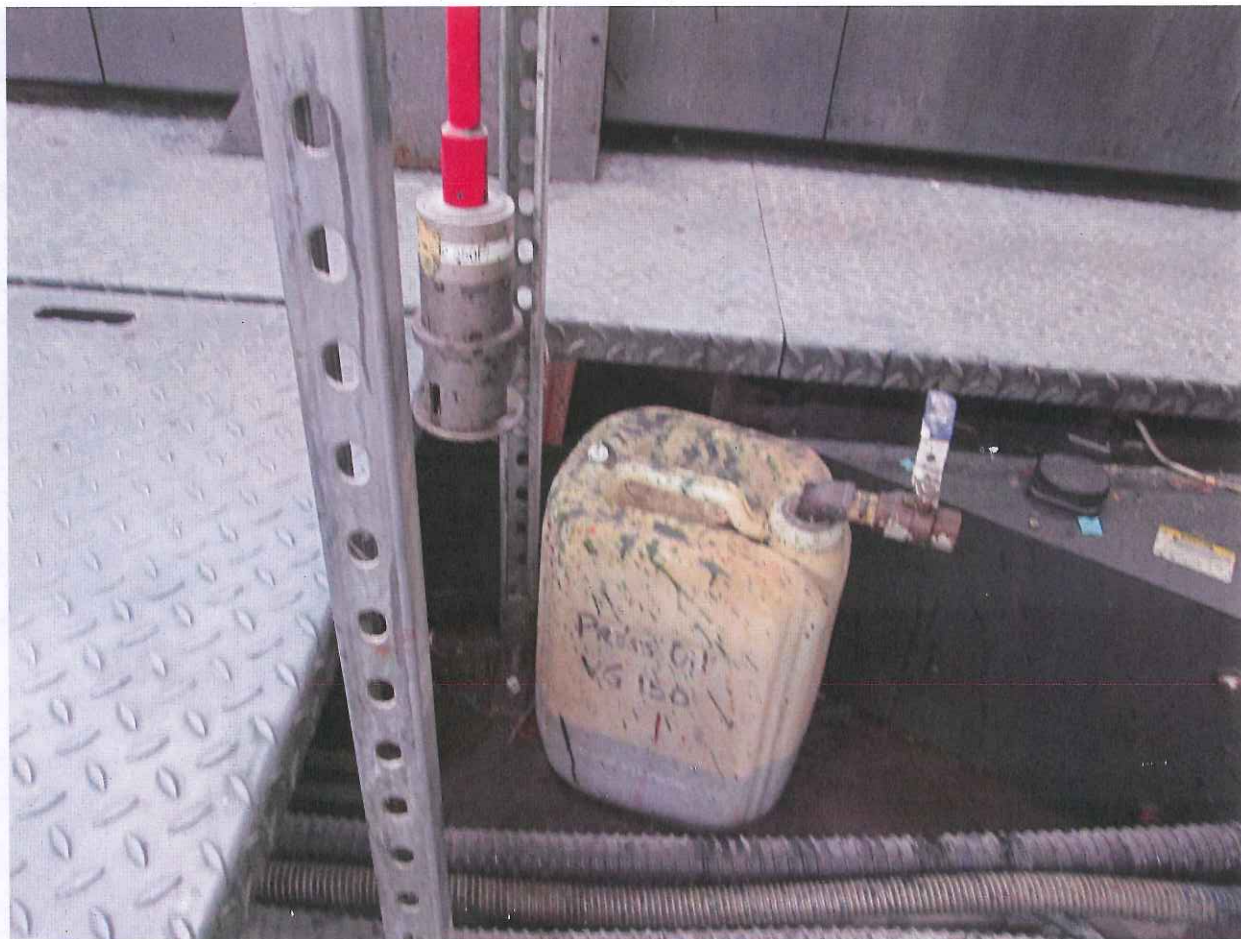
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

8-color printing press

SCENE BEING PHOTOGRAPHED:

one, unlabeled 5-gallon container of waste solvent

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 4

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

near 12-color printing press

SCENE BEING PHOTOGRAPHED:

one opened/unlabeled 5-gallon satellite accumulation
containers of waste solvent and one emptied container

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 5

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

outside of Chemical Explosion Room

SCENE BEING PHOTOGRAPHED:

Chemical Recycler-55-gallon drum of non-hazardous waste sludge

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 6

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

Chemical Explosion Room

SCENE BEING PHOTOGRAPHED:

330-gallon container of raw product (blanket/roller wash) and nine, 55-gallon containers of raw material (blanket wash).

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 7

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

Chemical Explosion Room

SCENE BEING PHOTOGRAPHED:

unlabeled 240-gallon satellite accumulation container and unlabeled 240-gallon 90-day container of waste solvent

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 8

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

Explosion Room

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon container of used oil

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 9

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

Shipping/Fulfillment Department

SITE LOCATION:

Two Hardman Drive

Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 10

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 19, 2015

LOCATION OF PHOTOGRAPH:

Bindery/Finishing Department

SITE LOCATION:

Two Hardman Drive
Bloomington, IL 61701

INSTALLATION NAME:

Original Smith Printing

INSTALLATION I.D. #

ILD 984 834 424



PHOTOGRAPH: 11

NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

November 19, 2015

Cutting Department

Two Hardman Drive

Bloomington, IL 61701

Original Smith Printing

ILD 984 834 424



PHOTOGRAPH: 12	
NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	November 19, 2015
LOCATION OF PHOTOGRAPH:	Printing Press
SITE LOCATION:	Two Hardman Drive Bloomington, IL 61701
INSTALLATION NAME:	Original Smith Printing
INSTALLATION I.D. #	ILD 984 834 424

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	One opened Satellite container of waste
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p>	
	<p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression, or uplift? Yes _____ No _____ N/A _____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____ 	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient-freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes <u>✓</u> No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(e))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	no address
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <ul style="list-style-type: none"> - police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) information regarding emergency coordinators changes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>e) information regarding equipment changes?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<p>no initial H.W. training for William Johnson</p>
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 	<p>no job description for Amy Fuller or description of training etc.</p>
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<p>No initial or Annual training in building facilities Supervisor</p>

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the plan on-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled. SUBPART D: RECORDKEEPING AND REPORTING Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.140(a)		722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Section 722.142 Exception Reporting	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170
	COMMENTS:	

